



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

MAR 29 2016

OFFICE OF
COMPLIANCE AND ENFORCEMENT

Reply To: OCE-101

CERTIFIED MAIL -- RETURN RECEIPT REQUESTED

Ms. Shirley Yap
General Manager
Puget Sound Refinery
Shell Oil Products LLC
P.O. Box 622
Anacortes, Washington 98221

Re: Request for Information Regarding the Facility located at 8505 South Texas Road, Anacortes, Washington.

Dear Ms. Yap:

The U.S. Environmental Protection Agency, Region 10 (EPA) is seeking information and documents relating to the environmental conditions at the facility located at 8505 South Texas Road, Anacortes, Washington.

EPA is requesting additional information after a Risk Management Program inspection that was conducted the week of August 10, 2015. Pursuant to the authority of Section 114 of the Clean Air Act (CAA), 42 U.S.C. § 7414, you are hereby requested to respond to the Information Request.

In the Information Request (Enclosure 1), EPA requests information concerning processes at the facility subject to the requirements of CAA § 112(r), 42 U.S.C. § 7412(r). The enclosed Statement of Certification (Enclosure 2) should be signed by a duly authorized officer or agent and returned with the response to this Information Request.

While EPA seeks your voluntary cooperation in this investigation, compliance with the Information Request is required by law. Failure to provide complete and truthful responses to this Information Request within **thirty (30) days** of your receipt of the request, or to adequately justify such failure to respond, may subject you to an enforcement action by EPA pursuant to § 113(a)(3) of the CAA. The statute permits EPA to seek the imposition of penalties of up to \$37,500 for each day of non-compliance.

Please note that responses which are incomplete, ambiguous, or evasive may be treated as non-compliance with the Information Request. If you believe a question is not applicable to the facility, explain in detail the reason for that belief. Please be further advised that provision of false, fictitious, or fraudulent statements of representations may subject you to criminal penalties under 18 U.S.C. § 1001 or Section 113(c)(2) of the CAA, 42 U.S.C. § 7413(C)(2).

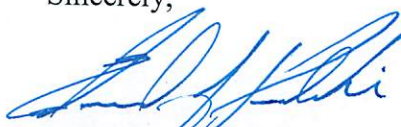
A complete copy of all responses should be sent to:

Javier Morales
U.S. EPA, Region 10
1200 Sixth Avenue, Suite 900, OCE-101
Seattle, Washington 98101

Due to the legal ramification of your failure to respond properly and promptly, EPA strongly encourages you to give this matter your immediate attention and to respond to this Information Request within the time frame specified above, unless prior to the date, you send a written request and receive approval from EPA for an alternate date. If you have any legal or technical questions relating to this Information Request, you may consult with EPA.

If you have any questions regarding this request, please contact Javier Morales in the Office of Compliance and Enforcement at (206) 553-1255 for CAA technical matters, or Julie Vergeront in the Office of Regional Counsel at (206) 553-1497 for legal matters.

Sincerely,



Edward J. Kowalski
Director

Enclosures

1. CAA Section 112(r) Information Request
2. Statement of Certification

ENCLOSURE 1
CAA Section 112(r) Information Request

A. INSTRUCTIONS

1. Please provide a separate narrative response to each question and subpart of a question set forth in this Information Request, with the number of the question to which it corresponds. A complete set of all responses should be sent to the following address:

Javier Morales
U.S. EPA Region 10
1200 Sixth Avenue, Suite 900, OCE-101
Seattle, WA 98101

2. For each question contained herein, identify each document consulted, examined, or referred to in the preparation of the response or that contains information responsive to the question, and provide a true and correct copy of each such document if not provided in response to another specific request herein.
3. Indicate on each document produced in response to this Information Request, or in another reasonable manner, the number of the question to which it corresponds.
4. If requested information or documents are not known or are not available to you at the time of your response to this Information Request, but later become known or available to you, you must supplement your response to EPA. Moreover, should you find at any time after submission of your response that any portion is or becomes false, incomplete, or misrepresents the facts, you must provide EPA with a corrected response as soon as possible.
5. The information requested herein must be provided whether or not you regard part or all of it as a trade secret or confidential business information. You may, if you desire, assert a business confidentiality claim covering all or part of the information submitted pursuant to Section 114 of the Clean Air Act, 42 U.S.C. § 7414, and 40 C.F.R. Part 2, by labeling such information at the time it is submitted to EPA as "trade secret" or "proprietary" or "company confidential" or other suitable notice.

The information covered by such a claim will be disclosed by EPA only to the extent and by the procedures set forth in statutes and 40 C.F.R. Part 2, Subpart B. Additional rules governing certain information obtained under the CAA appear in 40 C.F.R. § 2.301. Unless you make a claim at the time that you submit the information in the manner described in 40 C.F.R. § 2.203(b), it may be made available to the public by EPA without further notice to you. You should read 40 C.F.R. Part 2 carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.

B. DEFINITIONS

The following definitions apply to this Information Request. All terms not defined herein shall have their ordinary meaning unless such terms are defined in the Clean Air Act or in the regulations at 40 C.F.R. Part 68.

1. The "company" refers to either the owner or operator of the facility, or both. If a question would have a different response because the owner and operator are different entities, the response shall be made in relation to both.
2. The term "document" means any object that records, stores, or presents information, and includes writings, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hard copy,

including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include: (a) any copy of each document which is not an exact duplicate of a document which is produced, (b) each copy which has any writing, notation, or the like on it, (c) drafts, (d) attachments to or enclosures with any document, and (e) every other document referred to or incorporated into each document.

3. The terms "identify" and "describe" mean, with respect to a corporation, partnership, business trust, or other association or business entity (including a sole association or sole proprietorship), to set forth its full name, address, legal form (e.g., corporation, partnership, etc.), registered agent, organization, if any, and a brief description of its business.
4. The terms "identify" and "describe" mean, with respect to a natural person, to set forth the person's name, present or last known business address and business telephone number, present or last known home address and home telephone number, and present or last known job title, position, or business.
5. The terms "identify" and "describe" mean, with respect to a document, to provide its customary business description, its date, its number, if any (catalog, index, storage, invoice or purchase order number), the identity of the author, addressor, addressee and/or recipient, the substance, and the subject matter.
6. The terms "person" or "entity" shall have the same definition as "person" as defined in Section 302(e) of the Clean Air Act, and shall include any individual, association, corporation, partnership, or any federal, state, or local governmental entity.
7. The terms "you" or "Respondent" mean the addressee of this Request, and the addressee's subsidiaries, divisions, officers, directors, managers, employees, contractors, trustees, partners, successors, assigns, attorneys, and agents, as applicable.
8. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this information request any information which might otherwise be construed to be outside its scope.
9. The term "facility" means the property owned or operated by Shell Oil Products LLC located at 8505 South Texas Road, Anacortes, Washington.
10. The term "spent acid tanks" means the tanks at the facility used to store spent sulfuric acid from the Alkylation Unit #1 and Unit #2 and referred to as spent acid tanks TK-402 and TK-403.
11. The term "ammonia storage tank" means the tank used to store and supply ammonia to the selective catalytic reduction dilution skids for the Cogeneration Units and referred to as Tank 90-C009.
12. The term "operating procedures" means the written operating procedures that provide clear instructions for safely conducting activities involved in each covered process consistent with the process safety information as determined under 40 C.F.R. § 68.69.
13. Words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions.

C. INFORMATION REQUEST

Provide the following information for the facility.

1. Provide the date each spent acid tank TK-402 and TK-403 was installed at the facility. Provide supporting documentation.
2. Provide the written operating procedures required by 40 C.F.R. § 68.69 for the ammonia storage tank as follows:
 - a. The written operating procedures currently in effect, along with the date the operating procedures went into effect.
 - b. The written operating procedures in effect on August 10, 2015, along with the date the operating procedures went into effect.
 - c. All written operating procedures that were in effect in between the dates referred subparagraphs (a) and (b) above. Provide supporting documentation.

ENCLOSURE 2

Puget Sound Refinery
Shell Oil Products LLC.
P.O. Box 622
Anacortes, WA 98221

INFORMATION REQUEST **STATEMENT OF CERTIFICATION**

I certify that the enclosed responses to EPA's Information Request issued to Puget Sound Refinery, Shell Oil Products LLC are true, accurate, and complete. I certify that the portions of these responses which I did not personally prepare were prepared by persons acting on behalf of Puget Sound Refinery, Shell Oil Products LLC under my supervision and at my instruction, and that the information provided is true, accurate, and complete. I am aware that there are significant penalties for submitting false information in response to this Information Request, including the possibility of fine and imprisonment.

Signature

Printed Name

Title

Date